

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

KEITH ALLEN, #M21830,)	
)	
Plaintiff,)	
)	
v.)	No. 23-cv-3775-DWD
)	
WEXFORD HEALTH SOURCES,)	
INC, et al.)	
)	
Defendants.)	

**DEFENDANT NICHOLAS FLORENCE, M.D.'S
REQUESTS TO ADMIT TO PLAINTIFF**

Defendant, NICHOLAS FLORENCE, M.D., by his attorneys LITCHFIELD CAVO LLP, pursuant to Rules 26 and 36 of the Federal Rules of Civil Procedure, hereby requests that Plaintiff, Keith Allen #M21830, respond to the following Requests to Admit, no later than thirty (30) days from the date of service. FAILURE TO SERVE A WRITTEN ANSWER OR OBJECTION WITHIN THIRTY DAYS WILL RESULT IN ADMISSION OF THE FOLLOWING REQUESTS.

ADMISSION REQUESTS

1. Admit that Dr. Nicholas Florence did not personally examine you in connection with your right-hand injury in August 2021.

ANSWER:

2. Admit that Dr. Nicholas Florence's involvement in your care was limited to interpreting an x-ray of your right hand taken on August 20, 2021.

ANSWER:

3. Admit that you never communicated directly (in person or otherwise) with Dr. Nicholas Florence about your right-hand injury.

ANSWER:

4. Admit that Dr. Nicholas Florence did not have authority to determine what further treatment, testing, or referrals you received after August 20, 2021.

ANSWER:

5. Admit that no healthcare provider has told you that Dr. Nicholas Florence misinterpreted the August 20, 2021 x-ray of your right hand.

ANSWER:

6. Admit that you have not retained or identified any expert witness who will testify that Dr. Nicholas Florence's interpretation of the August 20, 2021 x-ray fell below the applicable standard of care.

ANSWER:

7. Admit that you received additional x-rays of your right hand after August 20, 2021.

ANSWER:

8. Admit that Dr. Nicholas Florence did not prevent you from receiving additional medical care, diagnostic testing, or treatment for your right-hand injury.

ANSWER:

9. Admit that Dr. Nicholas Florence did not make any statements or take any actions that were intended to cause you emotional distress.

ANSWER:

10. Admit that you have no evidence that Dr. Nicholas Florence falsified, altered, or misrepresented any radiology report or x-ray finding regarding your right-hand injury.

ANSWER:

Respectfully submitted,
LITCHFIELD CAVO LLP

By: /s/ James D. Sloan

Attorney for Nicholas Florence, M.D.

James D. Sloan - #6256682
Litchfield Cavo LLP
303 West Madison Street
Suite 300
Chicago, IL 60606
(312) 781-6650 Phone
sloanj@litchfieldcavo.com

CERTIFICATE OF SERVICE

I, Zachary G. Stillman, hereby certify that on July 25, 2025, I caused the foregoing to be served on all counsel of record via email, and upon Plaintiff via Certified Mail at:

Keith Allen
M21830
DUPAGE COUNTY JAIL
PO Box 957
Wheaton, IL 60189-0957

/s/ Zachary G. Stillman

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Defendants.)	

CERTIFICATE OF SERVICE

To: Keith Allen, M21830
Menard Correction Center
P.O. Box 1000
Menard, IL 62259

Under penalties as provided by law under 735 ILCS 5/1-109, I certify that on July 25, 2025, I caused a copy of the following documents:

- Defendant Nicholas Florence, M.D.'s Interrogatories to Plaintiff;
- Defendant Nicholas Florence, M.D.'s Request for Production of Documents to Plaintiff;
- Defendant Nicholas Florence, M.D.'s Requests to Admit to Plaintiff;

to be served on each party to whom it is addressed by email transmission from davies@litchfieldcavo.com, at 303 West Madison, Suite 303 Chicago, Illinois, to the designed email addresses of record for each of the parties to whom it is addressed, before the hour of 5:00 p.m.

Misty Davies

Misty Davies

James D. Sloan - #6256682
Litchfield Cavo LLP
303 West Madison Street
Suite 300
Chicago, IL 60606
(312) 781-6650 Phone
sloanj@litchfieldcavo.com

CERTIFICATE OF SERVICE

Under penalties as provided by law under 735 ILCS 5/1-109, I certify that on July 25, 2025, I caused a copy of the above Defendant Nicholas Florence, M.D. Interrogatories, Rule 214 Request to Produce and Request to Admit to Plaintiff, to be served on all counsel of record.

- ☒ With the Clerk of the Court using File & Serve Illinois which will send notification of such filing to the parties listed above:
- ☐ Personal service
- ☒ having copies deposited in a United States Post Office box sealed envelopes, proper postage prepaid, on July 25, 2025, before the hour of 5:00 p.m. at 303 West Madison, Chicago, Illinois.
- ☐ Overnight delivery to the address listed above.
- ☐ Via email transmission

/s/Misty Davies

Misty Davies

x] *Under penalties as provided by law pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein are true and correct.*